

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

JOHN T. LAMONT and  
PRESTON POULTER,

Plaintiffs,

v.

DEAN ASSAF A/K/A DA TALKS,  
VICTORIA KUNDERT  
A/K/A VIKKIVERSE,  
AND ETHAN VAN SCIVER.  
Defendants.

Civil Action No. 3:21-CV-1176-K

**DECLARATION OF ALI ASSAF**

I, Ali Assaf, declare as follows:

1. The following exhibits are true and correct copies of the public record.
2. **Exhibit 1** is a true and correct copy of Plaintiff Lamont's Kickstarter campaign for "The Demonatrix" comic book .
3. **Exhibit 2** is a true and correct copy of the update to Plaintiff Lamont's Kickstarter campaign for "The Demonatrix" comic book dated March 16, 2001.
4. **Exhibit 3** is a true and correct copy of Kickstarter's "Prohibited Items" obtained directly from the Kickstarter website.
5. **Exhibit 4** is a true and correct copy of Plaintiff Poulter's Kickstarter campaign for White Lily: the Trade Paperback - 164 Full Color Pages from the Kickstarter website.

6. **Exhibit 5** is a true and correct copy of Plaintiff Poulter's Kickstarter campaign for Guinevere and the Divinity Factory #4: Mega-campaign! from the Kickstarter website.

7. **Exhibit 6** is a true and correct copy of Plaintiff Poulter's Kickstarter campaign for Guinevere and the Divinity Factory #5 / Trade Paperback from the Kickstarter website on August 17, 2021.

8. **Exhibit 7** is a true and correct copy of tweets published by Plaintiff Poulter during the North Texas RPG Con in Irvine, Texas from June 3, 2021 through June 6, 2021.

9. **Exhibit 8** is a true and correct copy of tweets published by Plaintiff Poulter during the Albuquerque Comic Con in Albuquerque, New Mexico from June 25, 2021 through June 27<sup>th</sup>, 2021.

10. **Exhibit 9** is a true and correct copy of tweets published by Plaintiff Poulter during Anime Matsuri in Houston, Texas from July 8, 2021 through July 11, 2021.

11. I declare under penalty of perjury that the foregoing is true and correct.

Dated this 18<sup>th</sup> day of August 2021 at Manteca, CA USA.

/Ali Assaf/

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Ali Assaf

## EXHIBIT 1 – Plaintiff Lamont’s Kickstarter Campaign for “The Demonatrix #1”


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### The Demonatrix #1 (Canceled)

Comicsgate™ and Optical Illusion Studios presents: The Demonatrix. A daz 3d adult action adventure comic written by John Lamont.



**\$26**  
pledged of \$1,500 goal

**4**  
backers

**Funding Canceled**  
Funding for this project was canceled by the project creator on Mar 16 2021

Last updated [March 16, 2021](#)

Comic Books Tampa, FL

Campaign FAQ Updates<sup>1</sup> Comments<sup>0</sup> Save

## Story

Comicsgate™ and Optical Illusion Studios presents: The Demonatrix

## STORY

## RISKS

*Emerald Mae Riley was a typical 17 year old growing up with her overbearing evangelical father. While having a sleepover with her best friend Jasmine, she thought it would be fun to read from an ancient occult book. Instead, she summoned the violent and sex crazed demon Lolita, who took over her body, murdered her father and sent her friend to the hospital. With the police and the heavenly host quick to track her down, Lolita leaves Emerald's body behind to take the rap, and embark on a drug and sex crazed trip throughout a modern metropolis.*

*The Demonatrix is a Daz3D adult action adventure comic story, featuring 36 beautiful full color pages. Plus, I partnered with two very talented Daz3D artists to produce some variant covers. All backers of \$5.00 or more will receive a Kickstarter Exclusive PDF featuring all six variant covers. As an added bonus, 11x17 virgin metal prints of each cover are available.*

## Lovely Variant Cover

*This cover was commissioned by a fellow Daz3D artist who wishes to remain anonymous. Artist re-imagined my characters in their own style and provided this lovely rendering.*

**John Lamont**

First created · 10 backed

Screenwriter and Comic Book Creator [See more](#)

## Support

Pledge \$5 or more

**Kickstarter Exclusive PDF**

Get a Kickstarter Exclusive PDF featuring all variant covers.

ESTIMATED DELIVERY  
Apr 2021

2 backers



Lovely Adult Variant Cover

A full nude adult variant cover from fellow Daz3D artist. Bringing their photo-realistic renders to grace your cover.



UnHolyOska Variant Cover

Daz3D artist [UnHolyOska](#), who's unique character styles provides this re-imagining of Emmy Riley reading from her summoning book.



UnHolyOska Seduction Variant Cover

[UnHolyOska](#) unique character style features Lolita attempting to seduce Emmy and damn her soul for eternity.



Emanuele Taglietti Inspired Cover

This cover is inspired by the art of [Emanuele Taglietti](#), who was notorious for drawing covers for adult comics in the 1970's. This image is a re-imagining of [Cimiteria, #15](#).



Main Retail Cover:

The main retail cover features Lolita in full demon form staring into your soul with glowing purple eyes.



Interior Pages:

Beautiful covers aside, we all know the interiors are where it's at. Here are some sampling of the interior story pages. All panels were created and rendered in Daz3d using the built in nVidia Iray render engine.



[Summoning Spells](#)



[A Night at The Club](#)



[A Girl Possessed](#)



[A Sudden Stop](#)

About the Author

John Lamont is a screenwriter and Daz3D artist. John spent several years in Los Angeles working in independent cinema as a screenwriter, producer, and assistant director before moving to Florida. He first entered the comic scene with his Daz3D webcomic series Blood Feud currently running on [Deviant Art](#) and [Comic Fury](#).

Risks and challenges

All art pages are done. The only thing left is handle some back office business, order prints, and mail them out. I expect fulfillment of print books within 90 days, and an extra 30 days for metal covers.

[Learn about accountability on Kickstarter](#)

Questions about this project? [Check out the FAQ](#)

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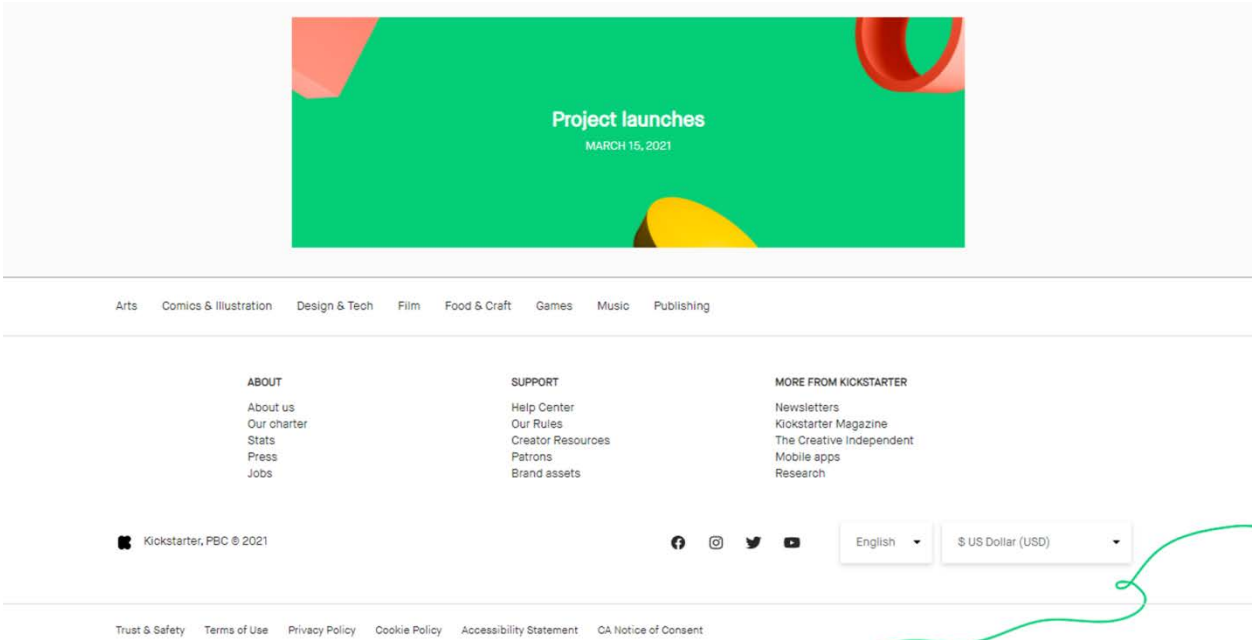


English

\$ US Dollar (USD)

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## EXHIBIT 3 – Kickstarter's Terms of Service (Emphasis Added)

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## Prohibited Items

We prohibit projects that are illegal, heavily regulated, or potentially dangerous for backers, as well as rewards that the creator did not make.

- ✗ Any item claiming to diagnose, cure, treat, or prevent an illness or condition (whether via a device, app, book, nutritional supplement, or other means).
- ✗ Contests, coupons, gambling, and raffles.
- ✗ Energy food and drinks.
- ✗ Offering a genetically modified organism as a reward.
- ✗ Live animals. Projects cannot include live animals as a reward.
- ✗ Offering alcohol as a reward.
- ✗ Offering financial, money-processing, or credit services; financial intermediaries or cash-equivalent instruments; travel services (e.g., vacation packages); phone services (e.g., prepaid phone services, 900 numbers); and business marketing services.
- ✗ Political fundraising.
- ✗ Pornographic material.
- ✗ Projects that promote discrimination, bigotry, or intolerance towards marginalized groups
- ✗ Projects that share things that already exist, or repackage a previously-created product, without adding anything new or aiming to iterate on the idea in any way.
- ✗ Resale. All rewards must have been produced or designed by the project or one of its creators — no reselling things from elsewhere.
- ✗ Drugs, nicotine, tobacco, vaporizers and related paraphernalia.
- ✗ Weapons, replicas of weapons, and weapon accessories.

If your project involves something illegal, heavily regulated, or potentially dangerous for backers and it is **not** on this list, please [contact us](#) before starting your project.

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## EXHIBIT 4 – Plaintiff Poulter’s Kickstarter Campaign for White Lily

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### White Lily: the Trade Paperback - 164 Full Color Pages



White Lily Trade Paperback & Princess v Zombies #1

FREE DOWNLOAD OF 1ST 2 ISSUES of the two deadliest female fighter pilots in history. Also, Princesses v Zombies #1


Discount at the eBay Store

Created by  
Preston Poulter

135 backers pledged \$5,424 to help bring this project to life.  
Last updated April 6, 2021

Campaign FAQ Updates Comments Community

Share this project Save



White Lily Trade Paperback & Princess v Zombies #1

White Lily: the Trade Paperback - 168 Full Color Pages

Dallas, TX Graphic Novels

Story

Just Added!

STORY

\$5,424  
pledged of \$5,000 goal

135  
backers

#### Support

Pledge \$12 or more

**The White Lily TPB in PDF Form**

You get the White Lily TPB in PDF form complete with cover gallery.

INCLUDES:

- White Lily TPB PDF

ESTIMATED DELIVERY:  
Dec 2020

25 backers Add-ons

Pledge \$18 or more

**White Lily Poker Deck**

You get a copy of the White Lily poker deck of 52 cards plus 2 jokers. Each rank features different art.

FREE DOMESTIC SHIPPING

RISKS



Get these 5 White Lily images as both 11x17" paper prints AND 2x5x3.5" metal trading cards WITH a 2021 White Lily Wall Calendar as it's own tier for \$50 or as an add-on for \$40. Did I mention FREE SHIPPING?



### I just got the White Widow #5 and I Make Boys Cry #1 Covers in from Absolute

I commissioned special covers for these new books by Absolute Comics and I'm offering them as part of this campaign. Select either a trade dress version or a completely virgin cover as a stand alone main perk or as add-ons.



### White Lily Story

White Lily tells the the story of the two deadliest female fighter pilots who ever lived: Lydia "Lilya" Litvyak (callsign "White Lily") and Katya Budanova. Together, these two women fought for the Soviet Union during the second World War where they each shot down five enemy planes to become the only two "Ace" female fighter pilots in world history.

### Read the first two issues free!

I set out to tell their life in five issues; each of the series has been successfully funded and fulfilled here on Kickstarter. This campaign offers the previously created 5 comics in one combined 168 page trade paperback that tells the complete story. The book contains a cover gallery showing all the beautiful cover images that have been made for the story over the years, as well as my reflections on it as the writer and creator.

In addition, in time for the holidays, I am offering a poker deck of 52 cards plus 2 jokers that feature the White Lily Artwork.



*Different artwork for each rank*

Also, I created a wall calendar that not only features the cover artwork for White Lily, but also, dates related to the story.



In addition to the typical calendar holidays being noted it will also mark the important dates to the story and the characters. This will help you imagine the lives of the characters as they start the Battles of Stalingrad and Kursk. Of course, we also celebrate the days that Katya and Liliya were declared heroes by the Russian government.

## Add-ons available

Kickstarter is rolling out functionality to add products to your main pledge within the Kickstarter interface itself. I am offering a variety of products for you including:

- The Comic Book Certification Service (CBCS) to grade and slab your comic book.
- The variant covers of Guinevere and the Divinity Factory

## Risks and challenges

All five of these issues have previously been fulfilled. The only risk to your not receiving your book lies in not filling out your survey.

[Learn about accountability on Kickstarter](#)

Questions about this project? [Check out the FAQ](#)

Report this project to Kickstarter

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# **EXHIBIT 5** - Plaintiff Poulter's Kickstarter campaign for Guinevere and the Divinity Factory #4: Mega-campaign!

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Guinevere and the Divinity Factory #4: Mega-campaign!

Featuring exclusive, limited edition covers from Paolo Pantalena, Whisky Paint, and Matt Weldon. Plus a sexy lenticular

[Get the T-Shirt!](#)

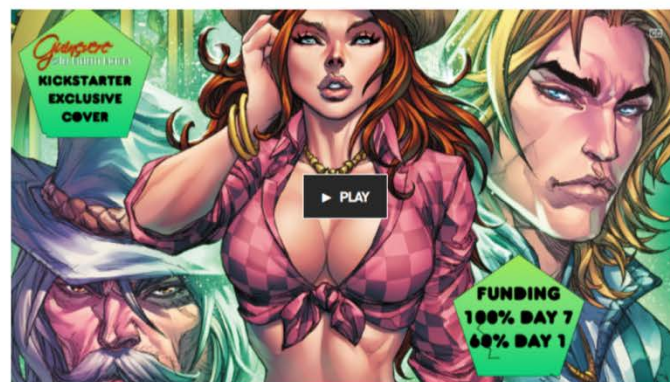
Created by  
Preston Poulter

315 backers pledged \$10,171 to help bring this project to life.

Last updated August 5, 2021

Campaign
FAQ
Updates 25
Comments 25
Community

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Guinevere and the Divinity Factory #4: Mega-campaign!

Dallas, TX Comic Books

Story

Buy Your Copy at the eBay Store

STORY

RISKS

Sorry you missed out, but you can still get the back issues.

[GET YOURS NOW.](#)

\$10,171  
pledged of \$5,000 goal

315  
backers

Support

Pledge \$5 or more

PDF of Issue #4 Only

Get a PDF of Guinevere and the Divinity Factory #4.

INCLUDES:  
• Guinevere #4 PDF

ESTIMATED DELIVERY:  
May 2021

60 backers [Add-ons](#)

Pledge \$10 or more

Guinevere #4 Main Cover /  
FREE SHIPPING

You will receive the main cover version of Guinevere and the Divinity Factory #4, total circulation 1/250.

## A Lost Soul in Search of Redemption

Guinevere and the Divinity Factory explores a lot of tropes of the Roaring 20's: unrestrained flapper parties, Lovecraftian monsters, futurism, art deco design elements, planned societies, and, of course, ladies of questionable morality.

In the first issue, which you can [DOWNLOAD FOR FREE](#), we find Guinevere, an addict healed through the power of magic, visiting the fantastic, palatial estate of The Great Wizard Gatsby™ so that she might learn magic from the powerful patron. He assigns her a quest which, over the course of the subsequent issues, bring her into conflict with sadistic demons and remorseless androids.

In issue #4, she must make a choice that determines the fate of her very soul.

## Beauty on Every Page

The Pocket Jacks Comics brands reflects a commitment to the slogan, "Beauty of every page." As you can see from the PDF of the first issue, I don't skimp on the budget for the interior pages. Every page of every issue is beautiful, and the **five interior splash pages** featured in issue #4 also sell as prints and metal trading cards on their own artistic merits.

## Risks and challenges

A prior version of this comic has already been fulfilled on Kickstarter. The only risk you face in not receiving your book lies in your responsibility to fill out your survey at the end.

[Learn about accountability on Kickstarter](#)

Questions about this project? [Check out the FAQ](#)

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## EXHIBIT 6 - Plaintiff Poulter's Kickstarter campaign for Guinevere and the Divinity Factory #5 /Trade Paperback

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### Guinevere and the Divinity Factory #5 / Trade Paperback

Rare limited editions of issue #5 featuring Miss Sashi, Keith Garvey, RB White, and Caanan White

**\$10,982**  
pledged of \$5,000 goal

**237**  
backers

**8**  
days to go

[Back this project](#)

[Remind me](#) [Facebook](#) [Twitter](#) [Email](#) [Code](#)

All or nothing. This project will only be funded if it reaches its goal by Thu, August 26 2021 10:23 AM EDT.

Comics Dallas, TX

Kickstarter connects creators with backers to fund projects.

Rewards aren't guaranteed, but creators must regularly update backers.

You're only charged if the project meets its funding goal by the campaign deadline.

Campaign
Risks
FAQ
Updates 5
Comments 5
Community

### STORY

### Story

#### Beauty on Every Page

The Pocket Jacks Comics brands reflects a commitment to the slogan, "Beauty of every page." As you can see from the PDF of the first issue, I don't skimp on the budget for the interior pages. You will find every page of this gorgeous comic as stunning as the cover.

#### A Lost Soul in Search of Redemption

Guinevere and the Divinity Factory explores a lot of tropes of the Roaring 20's: unrestrained flapper parties, Lovecraftian monsters, futurism, art deco design elements, planned societies, and, of course, ladies of questionable morality.

In the first issue, which you can [DOWNLOAD FOR FREE](#), we find Guinevere, an addict healed through the power of magic, visiting the fantastic, palatial estate of The Great Wizard Gatsby™ so that she might learn magic from the powerful patron. He assigns her a quest which, over the course of the subsequent issues, bring her into conflict with sadistic demons and remorseless androids.

Issue #5 warps up the exciting story with a conclusion you will not see coming.



**Preston Poulter**

19 created · 58 backed

I am a creator of comics as well as the executive producer of the movie, "Standoff at Sparrow... [See more](#)

### Support

Pledge without a reward

\$ 10

**Back it because you believe in it.**

Support the project for no reward. Just because it sneaks.

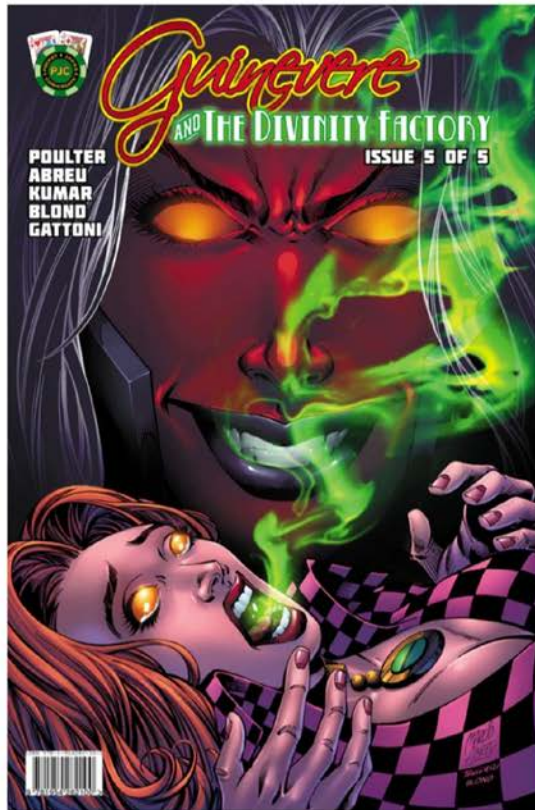
## The Rewards

This campaign makes use of Kickstarter's new Add-On feature allowing you to build your own reward packages. Start by selecting the main tier from the one's available below.

## Issue 5 Covers



Miss Sashi's cover of Guinevere #5



The main retail cover of issue 5



Canaan White cover of #5



Only 100 copies of Keith Garvey's cover will be issued.



RB White Virgin Nice Cover



The cover of the trade paperback



Get 1 of 20 of the Chains the Bind cover of Issue #5

Questions about this project? [Check out the FAQ](#)

[Report this project to Kickstarter](#)

#### WE ALSO RECOMMEND



#### Scorpiana 3: Revelations!

The third issue starring the most dangerous woman in comics, Scorpiana!

By [Michael Shoemaker](#)



#### Detonator - Issues #1, #2, and #3!

A new action-packed comic exploring PTSD, isolation, and misguided supervillainy - DETONATOR is coming soon.

By [James Parrish](#)



#### Pixie Trix Comix Volume 2 & more!

Help us fund the printing of Pixie Trix Comix Vol. 2, and the printing and creation of Ultraturnals #2 and Infernica Sinn #1

By [Pixie Trix Comix](#)



#### The Hunt for Goatman - A Horror Comic

In the final issue of the trilogy, a detective is tasked with leading the hunt for the Goatman who is on a warpath of destruction.

By [Joseph Oliveira](#)

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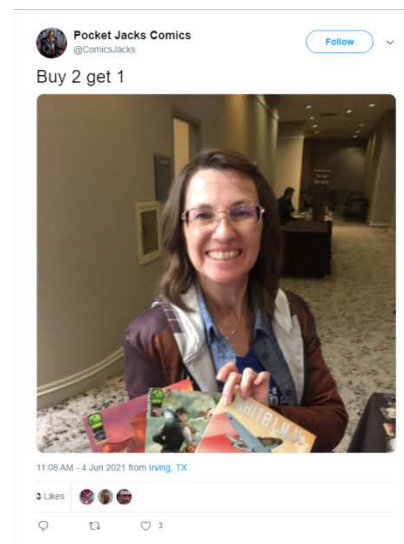
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**EXHIBIT 7 - Tweets published by Plaintiff Poulter during the North Texas RPG Con in  
Irvine, Texas from June 3, 2021 through June 6, 2021**













9. **EXHIBIT 8** - Tweets published by Plaintiff Poulter during the Albuquerque Comic Con in Albuquerque, New Mexico from June 25, 2021 through June 27<sup>th</sup>, 2021





**EXHIBIT 9 - Tweets published by Plaintiff Poulter during Anime Matsuri in Houston, Texas from July 8, 2021 through July 11, 2021.**

